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November 1, 2007

VIA ELECTRONIC FILING

The Honorable Mary Pat Thyng
U.S. District Court for the District of Delaware
844 King Street
Wilmington, Delaware 19899

Re: Joe Gano v. Donald Mark Ehart and Spread Eagle, Inc.
Delaware District Court, C.A. No. 07-271-***

Dear Magistrate Thyng:

As per your Honor's request, I am writing to update the Court on the parties' attempt to resolve the discovery issue discussed during the Court's status conference in this matter.

Plaintiff issued a Request for Production of Documents to Defendant Ehart requesting certain support records from Defendant Ehart's support proceedings in the Delaware Family Court, which include a valuation of Defendants' business assets at issue in this action. Additionally, Plaintiff issued a subpoena upon the Family Court to produce these records. The Family Court filed a Motion to Quash Subpoena on October 11, 2007. The Court decided to reserve ruling upon the Motion to Quash to allow the parties to amicably resolve the issue.

Plaintiff's counsel is working with Deputy Attorney General Ralph K. Durstein to finalize a confidentiality agreement that would provide Plaintiff with access to the Family Court records in Defendant Mark Ehart's custody and support proceedings. The confidentiality agreement would require the signature of both Plaintiff's and Defendants' counsel.

However, Defendants are unwilling to sign the confidentiality agreement. Thus, Plaintiff respectfully requests that the Court intervene and schedule a teleconference to resolve this matter.



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I am available at your Honor's convenience to answer any questions.

Respectfully,

/s/ Sophia Siddiqui (#4914)

Sophia Siddiqui

cc: Richard Cross, Esquire (via hand delivery)
Tara M. DiRocco, Esquire (via hand delivery)
Ralph K. Durstein, Esquire (via hand delivery)
Todd Nurick, Esquire
Wendy Rothstein, Esquire